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June 9, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: Section 68.4(a) of the Commission's Rules Governing
Hearing Aid Compatibility Telephone
WT Docket No. 01-309 EX PARTE

Dear Ms. Dortch:

This is to inform you that on June 5, 2003, representatives of Siemens and Cingular Wireless met in a joint meeting with members of the Wireless Telecommunications Bureau, Office of Engineering and Technology and Consumer and Governmental Affairs Bureau concerning issues related to the referenced subject. A list of the attendees and participants in the meeting is provided as an attachment. Also attached are the documents used during the meeting for discussion purposes.

Please associate this notification and accompanying material with the referenced docket proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond
Vice President-Federal Regulatory Affairs

Attachments

Cc: Mindy Littell
Greg Guice
Patrick Forster
Janet L. Sievert
Jerome A. Stanshine
Rashmi Doshi (via video conferencing)
David L. Means (via video conferencing)

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Siemens & Cingular Wireless

WT Docket No. 01-309 **EX PARTE**
June 5, 2003

Siemens

Ross Vincenti (via conference bridge)
Scott Constance
Stephen Berger (Technical Consultant)
Mark Esherick

FCC-Wireless Telecommunication Bureau

Mindy Littell
Greg Guice
Patrick Forster

Cingular Wireless

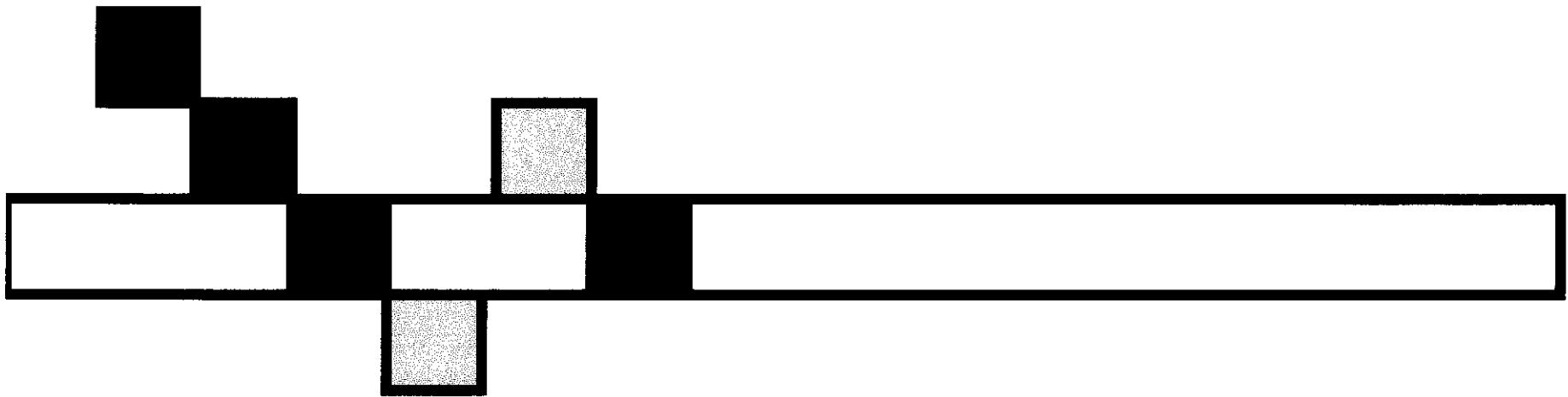
Susan K. Mazrui
Ben G. Almond

Consumer and Governmental Affairs Bureau

Janet L. Sievert

Office of Engineering and Technology

Jerome A. Stanshine
Rashmi Doshi (via video conferencing)
David L. Means (via video conferencing)



Hearing Aid Compatibility (HAC)

WT Docket No. 01-309, Ex Parte




Cingular Wireless and Siemens



Status on HAC Efforts




- A greater number of telecommunication companies are now focused on HAC
 - CTIA has developed a Web site for sharing information on hearing aid compatibility – this provides the infrastructure needed once standard measures are available
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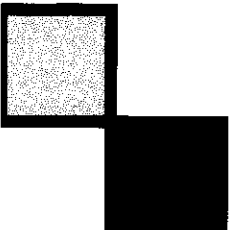

FCC Rulemaking – Re-thinking The Process



- In light of rapid technological innovation, flexibility becomes a driving force
 - Hearing aid compatibility rules should foster solutions that are **(a) affordable to consumers, (b) usable and reliable, and (c) flexible enough to embrace new technologies**
- 




(A) Focus on Affordability

- 
- “Seed Stock” program should be an option for manufacturers to meet new T-Coil requirements
 - Enables faster, lower cost, more effective solutions in an appropriate number of phones – a “win-win” for consumers and manufacturers
 - Cost for consumers with a hearing loss should not be higher and delivery should be timely
 - Provides for more customized approach which may be necessary for some consumers
 - Allows manufacturers greater flexibility in meeting needs of consumers, provided no re-certification is required for modified handsets
- 



(B) Focus on Usability and Reliability

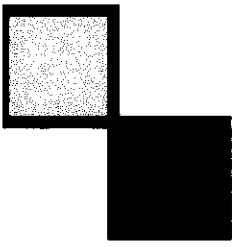



- Usability and reliability should be based on a “readily achievable” standard consistent with Section 255
 - “Readily Achievable” standard allows for innovation in handset design and performance yet also ensures usable and reliable accessibility
 - 1st level – built into handsets
 - 2nd level – with “attached” accessories
 - 3rd level – manufacturer must document when “not readily achievable” and seek waiver
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(See additional discussion of “Readily Achievable” standard in companion handout entitled Hearing Aid Compatibility: Encouraging Flexibility and Innovation)

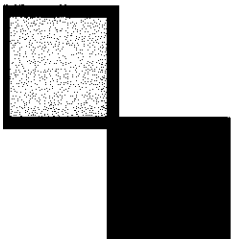



(C) Focus on Equivalent Facilitation

- 
- Encourages manufacturers to develop innovative, low cost, high performance solutions, especially with respect to t-coil coupling
 - Benefit to consumers who do not want to be locked into older, obsolete and less efficient technologies
 - Relationships forged in inter-industry efforts such as the ATIS Incubator should promote innovation
- 



Testing RF Emissions and Inductive Coupling




- Should be addressed as separate issues
 - ANSI C63.19
 - Stronger Consensus on RF emissions section
 - Debate on effectiveness of inductive coupling section
 - ANSI ASC C63 is making plans for next revision in response to increased experience, information and technical developments
 - Standard test methods for demonstrating ***equivalent facilitation*** need to be developed
- 



A Focus on Problem Solving: ATIS Technical Incubator




- Siemens and Cingular have consistently advocated for the development of a technical incubator to coordinate and systematically advance efforts to address hearing aid compatibility with digital wireless technologies
 - Siemens and Cingular fully support the current efforts of the ATIS Technical Incubator.
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Focus on Problem Solving




- ATIS Technical Incubator
 - Brings together both wireless and hearing industry
 - Includes guidance from consumers and hearing health professionals
 - Can conduct tests quickly and make recommendation to appropriate standards bodies
 - Neutral third party - brings integrity to the process
 - Companies will coordinate activities meaning less duplication of efforts, lower costs, faster innovation, and agreement on standards
- 



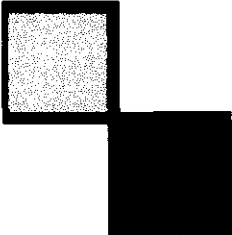

The FCC Support Is Needed



- Recognize ATIS Technical Incubator and other technology focused efforts by manufacturers
 - Encourage meaningful FDA involvement
 - Promote standardized communication to consumers and hearing health professionals
 - Make rule changes that encourage development of directional antennas and other technological innovations
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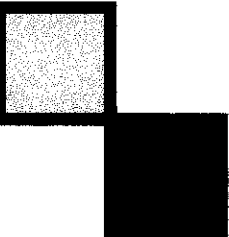



FCC Rules Should Support:

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- A “***Seed Stock***” option, without requiring re-certification, to encourage high quality solutions that will address the needs of hearing aid users with a range of hearing loss
 - A “***Readily Achievable***” standard to encourage development of reliable and usable handsets and which only grants waivers upon reasonable proof
 - “***Equivalent Facilitation***” to encourage innovative, high performance solutions that take advantage of new technologies
 - “***Product Availability***” consumers have access to at least one HAC wireless handset per product line
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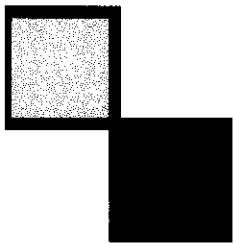



Update on Siemens Research

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- With Etymotic Research
 - Lab work on enhanced T-Coil circuitry very promising
 - User trials with audiologist being planned
 - Research planned with SHHH
 - With Gallaudet University
 - Phones evaluated per ANSI C63.19
 - User experience survey underway
 - Discussions continue regarding future phases of research
 - Both standard and modified “seed stock” phones being provided
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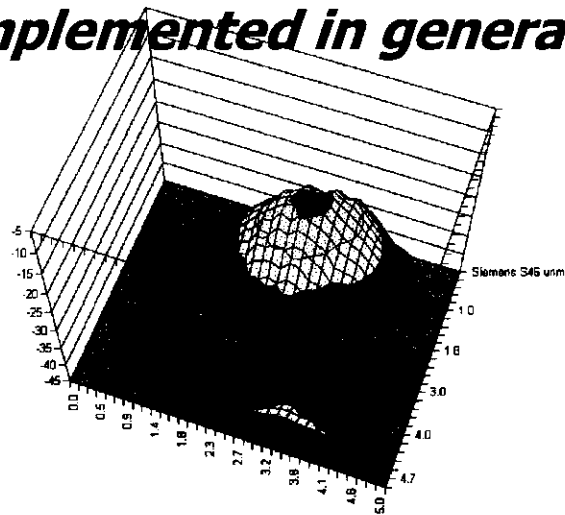


Update on Siemens Testing

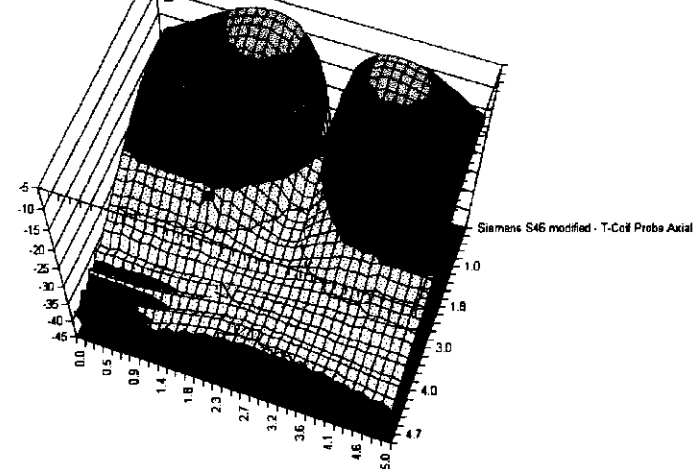
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- New testing shows most handsets sold to end-users presently fall in the U2 category.
 - Siemens Triano S hearing aid remains at the U4 category for RF immunity
 - ***When tested together the Triano S hearing aid had no audible interference near the handsets in microphone mode, but some interference in T-Coil mode.***
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Update on Siemens Testing

- Significant advances in special T-Coil enhanced phones.
- ***Optimized T-Coil modifications cannot be implemented in general market phones.***



Unmodified



Modified

T-Coil Signal (Axial)